



400 Crossing Boulevard
8th Floor
P.O. Box 5933
Bridgewater, NJ 08807

T: 908-722-0700

F: 908-722-0755

Direct: 908-252-4240

Email: mndonovan@norris-law.com

November 30, 2022

Via ECF

Hon. Cathy L. Waldor, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Sun Chemical Corporation v. American Home Assurance Company, et al.
Civil Action No. 2:20-cv-06252 (SRC-CLW)

Dear Judge Waldor:

Counsel for Plaintiff, Sun Chemical Corporation, and Counsel for newly added Defendant, Great American Alliance Insurance Company ("Great American Alliance"), are in the process of negotiating a stipulation, the purpose of which will be to preserve claims and defenses for both parties and to effectuate a dismissal of Great American Alliance without prejudice.

Great American Alliance's motion to dismiss is currently returnable on December 19th, with Sun Chemical's opposition brief due on December 5th. The parties jointly request that the motion to dismiss be adjourned until January 17th to permit time for the parties to negotiate a mutually acceptable stipulation.

Respectfully submitted,
NORRIS McLAUGHLIN, P.A.

A handwritten signature in blue ink, appearing to read 'Martha N. Donovan'.

Martha N. Donovan

RUGGERI PARKS WEINBERG LLP

A handwritten signature in blue ink, appearing to read 'James P. Ruggeri'.

James P. Ruggeri

cc: All Counsel of Record (Via ECF)